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LIZA GARDNER,
Plaintiff,

-against-

SEAN COMBS,
AARON HALL,
DONALD EARLE DEGRATE JR., AKA,
DEVANTE SWING,
UMG RECORDINGS, INC., UNIVERSAL
MUSIC GROUP, N.V.
JOHN DOES 1-10 (names being fictitious and
used to connote an unidentified person
responsible for this occurrence), JANE DOES
1-10 (names being fictitious and used to
connote an unidentified person responsible for
this occurrence), ABC CORPORATIONS 1-10
(names being fictitious and used to connote
unidentified entities responsible for this
occurrence),

Defendants.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

DOCKET NO.: 2:24-cv-07729-LMG-JRA

**DECLARATION OF
TYRONE A. BLACKBURN, ESQ.**

I, Tyrone A. Blackburn, Esq., hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am the principal attorney at T. A. BLACKBURN LAW, PLLC, located at 90 Broad Street, 2nd Floor, New York, NY 10004, and I am counsel of record for Plaintiff Liza Gardner in the above-captioned matter.
2. I submit this Declaration in support of Plaintiff's Joint Opposition to Defendants' Motions to Dismiss filed by Defendants Sean Combs, UMG Recordings, Inc., and Universal Music Group, N.V.
3. I have personal knowledge of the matters set forth herein, and if called as a witness, I could and would competently testify to the following facts.

4. The purpose of this Declaration is to authenticate and submit **Exhibits A-F** attached hereto, which are referenced in Plaintiff's Opposition to Defendants' Motions to Dismiss and are integral to demonstrating Defendants' jurisdictional contacts, misconduct, and liability.
5. These exhibits provide documentary and testimonial evidence supporting Plaintiff's well-pleaded allegations and confirming Defendants' direct and indirect roles in the events giving rise to this litigation.
6. I attach the following true and correct copies of exhibits referenced in Plaintiff's filings:
 - a. **Exhibit A – First Amended Complaint** filed in this action, which sets forth Plaintiff's claims in detail.
 - b. **Exhibit B – Sworn Declaration of Kirk Burrowes**, providing a firsthand account of the UMG Defendants subsidiary, UpTown Records/MCA Records, and Defendant Sean Combs from 1989/1990 to his departure in the early 2000's.
 - c. **Exhibit C – Affidavits of Monica Case**, an individual pictured with Plaintiff from the day of her rape by Defendants Combs and Hall. Monica Case has firsthand knowledge of Defendants' actions, corroborating Plaintiff's allegations.
 - d. **Exhibit D – Case Law**, including:
 - i. *RK Newark 2 Doe v. Roman Cath. Archdiocese*, No. A-3100-22, 2024 N.J. Super. Unpub. LEXIS 3239 (Super. Ct. App. Div. Dec. 31, 2024),
 - ii. *S.Y. v. Roman Catholic Diocese of Paterson*, Civil Action No. 20-2605 (ES) (CLW), 2021 U.S. Dist. LEXIS 188333 (D.N.J. Sep. 30, 2021).
 - e. **Exhibit E – Combs Federal Indictment**:
 - i. *Federal Indictment Of Sean Combs*: The indictment *United States v. Sean Combs* (Case No. 1:24-cr-00542) charges Combs with racketeering, sex trafficking, forced labor, kidnapping, arson, bribery, and obstruction of justice. Prosecutors allege that for decades, Combs operated a criminal enterprise through Bad Boy Entertainment, Combs Global, and related entities, using his businesses and employees to facilitate and conceal systematic abuse, drug-facilitated sex trafficking, and financial control over victims. He allegedly orchestrated "Freak Offs", where women were coerced into sex acts, drugged, and filmed without consent, while associates ensured their compliance through intimidation, surveillance, and threats. Investigators seized firearms, narcotics, and trafficking supplies from his properties, and the indictment details acts of kidnapping, physical violence, and bribery to silence witnesses. The government seeks asset forfeiture, and if convicted, Combs faces severe penalties, including lengthy prison sentences.
 - ii. *The Superseding Federal Indictment Of Sean Combs*: The superseding indictment in *United States v. Sean Combs* (Case No. 1:24-cr-00542)

expands on previous charges, adding new allegations of sex trafficking, forced labor, obstruction of justice, and violent criminal activity. Prosecutors detail how Combs allegedly used his businesses (Bad Boy Entertainment, Combs Global, etc.) as a front for a criminal enterprise that engaged in drugging, coercing, and trafficking victims for commercial sex, physically assaulting them, and using threats, surveillance, and financial control to maintain dominance. The indictment describes "Freak Offs"—events where victims were drugged, forced into sex acts, filmed without consent, and subjected to violence—with associates facilitating the abuse. Law enforcement seized firearms, narcotics, and trafficking supplies, and evidence suggests bribery and intimidation of witnesses to cover up crimes. The government seeks asset forfeiture, and Combs faces severe federal penalties, including potential life imprisonment, if convicted.

f. **Exhibit F – Public Records, Investigative Reports, and Media Coverage**, including prior lawsuits, settlements, and investigations related to Defendant's regarding similar misconduct:

- i. *Dawn Angelique Richard v. Sean Combs*; 1-24-cv-06848: alleges that Combs subjected Richard to years of abuse, exploitation, and violence during her time as a member of Danity Kane and Diddy – Dirty Money. The complaint details physical assaults, forced labor, sexual harassment, false imprisonment, and threats of retaliation.
- ii. *Crystal McKinney v. Sean Combs*; 1-24-cv-03931: alleges that in 2003, the plaintiff, then a 22-year-old model, was drugged and sexually assaulted by Combs at Daddy's House Recording Studio in Manhattan.
- iii. *John Doe v. Sean Combs*; 1-25-cv-00996: alleges that over a five-year period (2007–2012), the plaintiff, a Las Vegas-based entertainer and aspiring musician, was sexually abused, drugged, and exploited by Combs under the pretense of receiving help for his music career.
- iv. *Jane Doe v. Sean Combs*; 1-24-cv-09852: alleges that in 1991, the plaintiff, then visiting New York City, was drugged and raped by Sean Combs at City College during a charity basketball event.
- v. *John Doe v. Sean Combs*; 1-24-cv-08852: alleges that in 2022, the plaintiff, then 39 years old, was drugged and raped by Combs at a private party in New York City. The plaintiff claims he was given a drink laced with drugs, including GHB or ecstasy, which caused him to lose consciousness.
- vi. *Anthony Tate v. Sean Combs*; 1-24-cv-08810: alleges that in 2022, the plaintiff was drugged and raped by Combs at an after-party in Miami, Florida. The plaintiff claims that he was invited to the party by Combs' associates, given a laced drink containing GHB or ecstasy, and became disoriented.
- vii. *Jane Doe v. Sean Combs*; 1-24-cv-08808: alleges that in 2001, the plaintiff, then 18 years old, was drugged and sexually assaulted by Combs and his security team after a Halloween party at Club New Yorker in Manhattan. The plaintiff claims she and two friends were escorted to a limousine, where

- she was given a drink laced with GHB or ecstasy, causing severe intoxication and disorientation.
- viii. *Jane Doe v. Sean Combs*; 1-24-cv-08054: alleges that in 2004, the plaintiff, then 19 years old, was drugged and raped by Combs at a Marriott hotel in Manhattan after being invited to an after-party following a promotional photoshoot for Bad Boy Entertainment.
 - ix. *John Doe v. Sean Combs*; 1-24-cv-08812: alleges that in 2001, the plaintiff, an aspiring actor, was drugged and gang-raped by Combs and multiple individuals at a hotel in New York City under the pretense of an audition for a music video role.
 - x. *Jane Doe v. Sean Combs*; 1-24-cv-08813: alleges that in 2004, the plaintiff, then 17 years old, was drugged and raped by Combs at a Fourth of July party at his Hamptons estate. The plaintiff claims she was invited to the event by Combs' associates, had her phone and purse confiscated upon arrival, and was given a laced drink that caused severe disorientation and unconsciousness.
 - xi. *Jane Doe v. Combs*; 1-24-cv-07778: alleges that in 1998, the plaintiff, then 16 years old, was sexually assaulted by Combs at a "white party" at Combs' Hamptons residence. The plaintiff, who was invited under the pretense of networking in the music industry, claims that Combs lured him to a secluded area, coerced him into exposing himself, and forcibly groped his genitals.
 - xii. *John Doe v. Combs*; 1-24-cv-07973: alleges that Combs sexually assaulted the plaintiff, a businessman from Los Angeles, during a 2022 Cîroc Vodka promotional party in Los Angeles. The plaintiff, who had a prior business relationship with Combs, was invited to the event, where Combs allegedly took him into a private office, exposed himself, and forcibly groped the plaintiff's genitals.
 - xiii. *John Doe v. Combs*; 1-24-cv-07974: alleges that the plaintiff, a personal trainer, was drugged and sexually assaulted by Combs and others, including an unnamed "Celebrity A," at a 2022 awards show after-party hosted by Combs in Los Angeles. The plaintiff claims he was invited under the pretense of networking, made to sign an NDA, and given a drink allegedly spiked with GHB, after which he was led into a private room where he became disoriented.
 - xiv. *Jane Doe v. Combs*; 1-24-cv-07977: alleges that in 2014, the plaintiff attended a Las Vegas after-party hosted by Combs, where she was drugged and sexually assaulted. The plaintiff, who was invited by a Combs-affiliated party promoter, attended a celebrity-filled event at Club Rehab before being taken to an after-party at Combs' suite at Planet Hollywood.
 - xv. *Jane Doe v. Combs*; 1-24-cv-08024: alleges that in December 2022, the plaintiff, a 29-year-old independent music artist, was drugged and raped at a Manhattan house party hosted by Combs. The plaintiff, who attended with friends, was offered drugs by house staff, which she declined, and later engaged in a conversation with Combs about her music career.

- xvi. *Jane Doe v. Combs*; 1-24-cv-7769: alleges that in 2004, the plaintiff, then a 19-year-old college student, was drugged and raped by Combs at a Manhattan Marriott hotel after being invited to an after-party following a promotional photoshoot for his record label, Bad Boy Entertainment. The plaintiff and a friend were taken to Combs' hotel suite, where a security guard allegedly led them into a private room, locked the door, and left them alone with Combs.
 - xvii. *John Doe v. Sean Combs*; 1-24-cv-7778: alleges that Combs sexually assaulted the plaintiff, then a 16-year-old minor, at a "white party" in 1998 at his Hamptons residence. The plaintiff, invited under the pretense of networking in the music industry, claims that Combs lured him to a private area, forcibly groped his genitals, and attempted to groom him.
 - xviii. *Jane Doe v. Combs*; 1-24-cv-7777: alleges that in 1995, the plaintiff, then a young woman, was brutally assaulted and raped by Sean Combs at a promotional party for the music video "One More Chance" by Biggie Smalls in New York City. The complaint states that Combs lured her into a private bathroom under the pretense of conversation, then forcibly kissed her.
 - xix. *John Doe v. Combs*; 1-24-cv-7776: alleges that in 2006, the plaintiff, then employed as a security guard, was drugged and sexually assaulted by Combs at a "white party" in the Hamptons. The plaintiff claims that Combs provided him with two alcoholic drinks, which he later realized had been laced with drugs, including GHB or ecstasy.
 - xx. *John Doe v. Combs*; 1-24-cv-7774: alleges that in 2008, the plaintiff, who worked as an advisor for Ecko Clothing, was physically assaulted and sexually abused by Combs in the stockroom of Macy's Herald Square in Manhattan. The complaint states that Combs and three bodyguards cornered the plaintiff in a secluded stockroom, where Combs struck him at the base of the neck, knocking him to the ground.
 - xxi. *John Doe v. Combs*; 1-24-cv-07772: alleges that in October 2021, the plaintiff, who worked in the entertainment industry, was drugged and sexually assaulted at a party hosted by Combs in New York City. The plaintiff claims he was invited by Combs' associates, transported from the airport, and pressured to take drugs, which he refused.
- 7. Each exhibit attached hereto is a true, accurate, and complete copy of the original document.
 - 8. These exhibits have been properly sourced, authenticated, and referenced in Plaintiff's Memorandum of Law in Opposition to Defendants' Motions to Dismiss.
 - 9. Plaintiff respectfully requests that the Court take judicial notice of the publicly available documents attached hereto, pursuant to Federal Rule of Evidence 201, as these materials contain relevant, indisputable facts directly impacting the claims asserted in this case.

10. Based on the foregoing, and for the reasons set forth in Plaintiff's Opposition to Defendants' Motions to Dismiss, Plaintiff respectfully requests that the Court:

- a. Deny Defendants' motions to dismiss in their entirety;
- b. Find that Plaintiff has sufficiently pleaded claims under both federal and state law;
- c. Permit discovery to proceed, allowing Plaintiff to gather further evidence supporting her allegations; and
- d. Grant such other and further relief as this Court deems just and proper.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

DATED: February 10, 2025

/s/Tyrone a. Blackburn, esq.
TYRONE A. BLACKBURN
T. A. Blackburn Law, PLLC